



Michael F. Del Casino
Regulatory Division Manager

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2023
FAX 202-263-2616

May 16, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Telecommunications Relay Service, CC Docket No. 98-67

Dear Ms. Dortch,

Yesterday, Sue Decker, Burt Bossi (by phone) and I, representing AT&T met with Tom Chandler and Gregg Hilbok of the Consumer and Governmental Affairs Bureau to discuss AT&T's TRS Up-Front Automation Process for handling TRS calls. We discussed how AT&T's process relates to the Commission Rules regarding speed of answer and the call competition advantages of this process to consumers. The attached charts which were used at the meeting provide the details of that discussion.

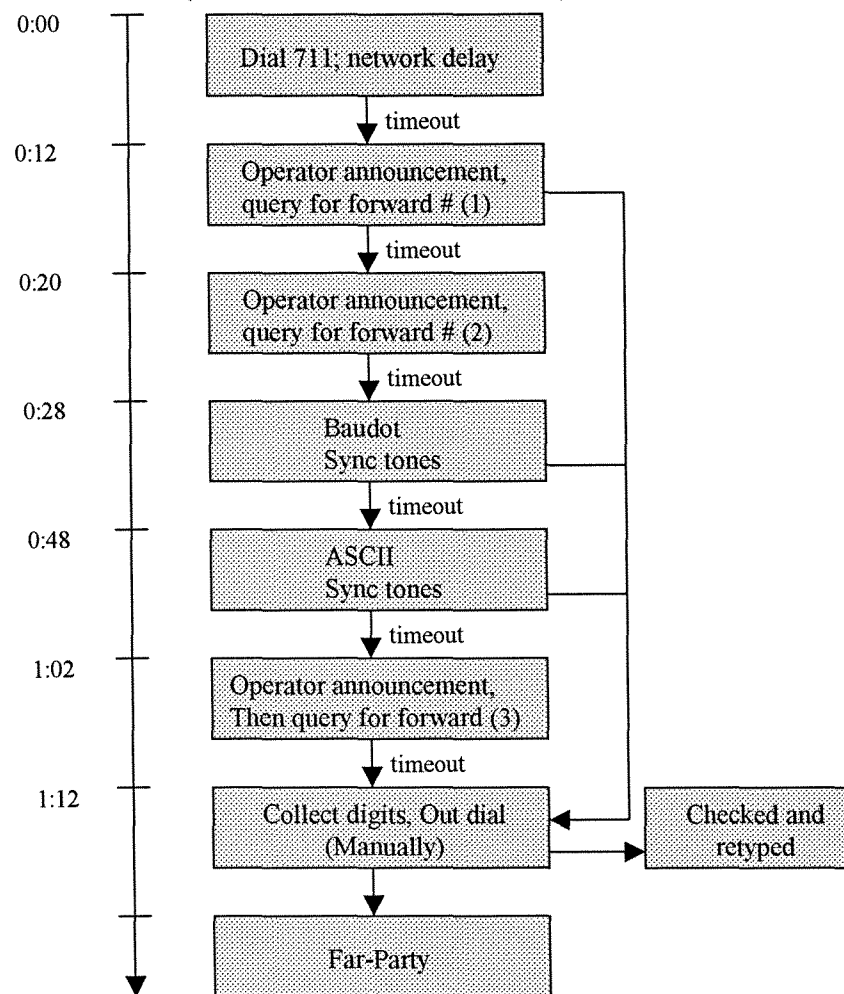
Two copies of this notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

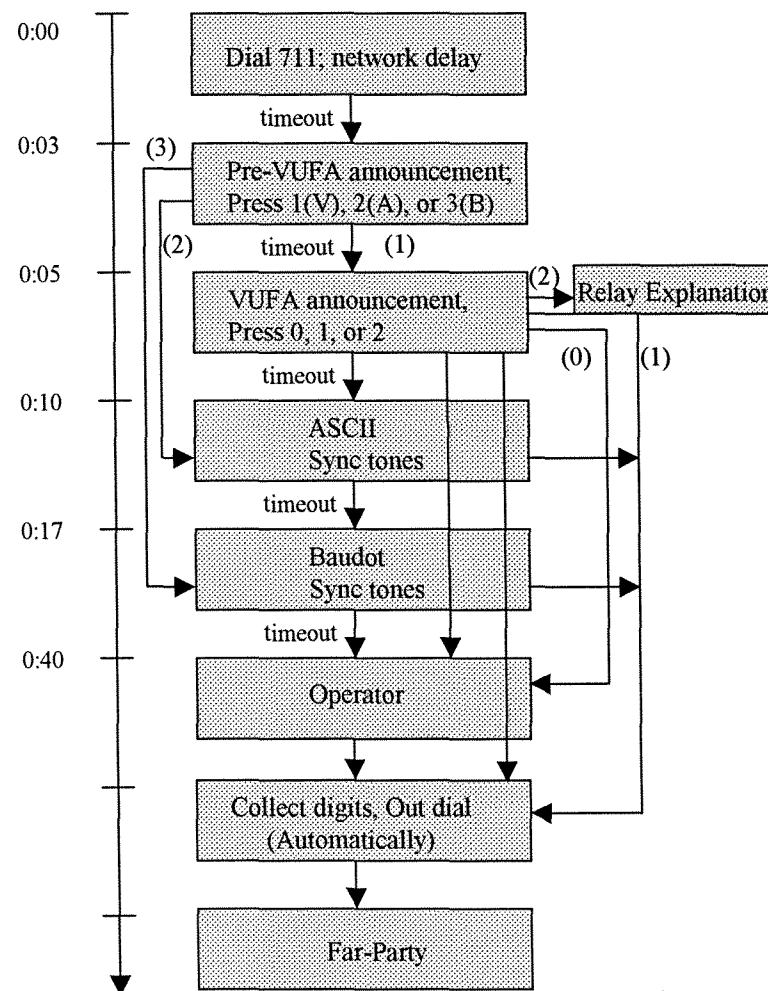
A handwritten signature in black ink, appearing to read "M Del Casino".

Attachment

Other Provider's 711 (no automation)



AT&T's 711 (automation)



NOTE: The timing bars indicate lapsed time if no action is taken during the call set-ups. For example, if the Other Provider's 711 is dialed, it would take almost 1:00 (1 minute) to synchronize with an ASCII device. If a caller dialed AT&T 711, ASCII interconnect would occur in 0:17. However, if a caller appended a "2" or a "3" to their dialing string (e.g. 711,,,3) or if they had a profile, AT&T's upfront automation would take them directly to baudot or ASCII tones instantly. Far-party digits are also auto-collected, and the far party is dialed while the operator joins the call.



AT&T'S AUTOMATED CALL HANDLING PROCESSES

AT&T introduced automated call handling via Upfront Automation ("UFA") to text customers in 1995 and to voice customers in 1997. Later when 711 was introduced in 1999, it too was integrated into AT&T's UFA processes.

AT&T supports the FCC's intent to making the call as close to dial tone as possible and in the scenario with UFA, AT&T customers (both text and voice) are answered immediately by Upfront Automation that acts as a "Communications Assistant (CA) emulator".

The "CA emulator" greets the customer and requests they input the "called to number" and any additional call set up instructions they may have for the CA. This direct dialing by the customer eliminates the need for the CA to re-type/re-voice the number back for verification.

Because AT&T can not control how long a customer will take to input the number and/or special instructions, AT&T does not include this time variable segment in calculating ASA.

Rather the system identifies when the customer has completed UFA by typing "GA" and the call is sent to a CA or placed in queue.

Timing resumes at this point.



THE BENEFITS OF UPFRONT AUTOMATION

Upfront Automation ("UFA") allows both TTY users and standard phone users with touch tone capabilities to directly enter the number they wish to call prior to being connected to a CA.

With UFA, callers have the option of directly entering the number they wish to call, or waiting for an available CA to join.

This feature is beneficial because it:

- (1) provides callers with more call control;
- (2) reduces the number of errors that may result when the CA needs to request the called number and then enter it on the billing record; and
- (3) reduces the call set up time by automatically populating the billing record eliminating the need for the CA to do this, resulting in lower total reimbursements from States

UFA makes it possible for AT&T Relay Services to have the fastest far party connections in the industry.

UFA reduces call setup time and speeds up the connection to the far party.